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SEP 27 2001

Mr. Ronald C. Sappington
Director of Compliance
and Quality Assurance
Gifts of Nature, Inc.
200 N. 1000 E.
St. George, Utah 84770

Dear Mr. Sappington:

This is in response to your letters of July 27, 2001 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that Gifts of Nature, Inc. is making the following claim, among others, for the product **Classic 7**:

“...helps them maintain normal blood sugar levels and normal blood pressure.”

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statement that you are making for this product suggests that it is intended to treat, prevent, cure or mitigate disease, namely disorders of blood glucose levels and hypertension. This claim does not meet the requirements of 21 U.S.C. 343(r)(6). This claim suggests that this product is intended for use as a drug within the meaning of 21 U.S.C. 321(g)(1)(B), and that it is subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, 7520 Standish Place, Rockville, Maryland 20855.

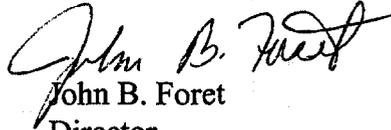
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Please contact us if we may be of further assistance.

Sincerely,



John B. Foret

Director

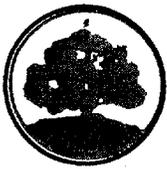
Division of Compliance and Enforcement
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300

FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200

FDA, Denver District Office, Office of Compliance, HFR-SW240

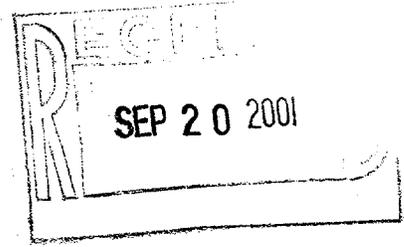


Gifts Of Nature

"Nature's Formula For Health"

27 July 2001

Office of Special Nutritionals (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street SW
Washington, DC 20204



To the Food and Drug Administration,

Pursuant to section 403(r)(6) for the Federal Food, Drug, and Cosmetic Act (FDC Act), 21.U.S.C. §343 (r)(6), We hereby notify the FDA that Gifts of Nature Inc., has included the following statements in labeling for a dietary ingredient that it markets for use as a dietary supplement. These statements will be used for all of our products in advertising literature.

The following information is provided:

- 1) Company Name: Gifts of Nature, 200 N. 1000 E., St. George, UT 84770
- 2) Product Name: Classic 7
- 3) The text of the statements are:

'A Superior Antioxidant to Maintain a Healthy Cardiovascular System'

'Provides essential nutrients that maintain normal blood sugar levels, promote hormonal balance and maintain a healthy circulatory system'

'Many people believe that Classic 7 helps them maintain normal blood sugar levels and normal blood pressure. And many women report that it relieves the symptoms of PMS.'

'This is an excellent product to support your circulatory and cardiovascular systems as well as to help maintain a healthy endocrine system and normal pancreatic function.'

- 4) Supplement Ingredients that are subject to these statements:

Vitamin C
Dried Wild Yam
Dried Cold Pressed Aloe Vera Extract
Dried Grape Seed and Skin Extract
Dried Peppermint Leaf
Dried Alfalfa Leaf

Pursuant to FDA regulations concerning notification procedures for certain types of statements on dietary supplements, 21 C.F.R. §101.93. I certify that to the best of my knowledge and in my opinion, the information contained in this notice is complete and accurate, and that Gifts of Nature Inc. has substantiation that the statements are truthful and not misleading.

Sincerely,

Ronald C. Sappington
Director of Compliance and Quality Assurance
Gifts of Nature Inc.

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